## Exhibit C

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July 14, 2020

## **VIA EMAIL**

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RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Dear Sarah and Seth:

We are writing to you both in your capacity as counsel for various Retail Pharmacy Defendants, and as Liaison Counsel, with regard to our recent discussions. First, we do not believe that an extension of the 30-day deadline set by the Court is appropriate. Judge Schneider was very clear on this issue in his ruling and again in his response to Ms. Davis' suggested 60-day delay which he declined. As set forth below, we will work with you as reasonably necessary to help ensure your clients' compliance with the Order.

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Sarah E. Johnston, Esq.

Seth A. Goldberg, Esq.

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With regard to the many inquiries we have received so far, we will endeavor to provide

responses to the extent we can do so in this short time frame, by the end of the week. One of the

requests we received from Walmart was for a list of all the applicable NDC codes. We will provide

a list of those known to Plaintiffs, and in light of the inability of defense liaison counsel to provide

a list that is confirmed as accurate, we request that all Defendants review the Plaintiffs' list and

add any missing NDC Codes, so that all of the parties will know that we have collectively arrived

at a confirmed accurate list of the NDC codes, which can be stipulated to. Please confirm your

agreement to do so.

Finally, in order to provide for the most efficient handling of the inquiries that may emanate

from the various Retail Pharmacy Defendants, we think the best way to proceed is for the Retailers

to collectively meet and confer among themselves to determine what information or clarifications

may collectively be needed from Plaintiffs, and then to present those inquiries on a collective,

organized basis, in order to streamline the process and allow for a focused meet and confer to the

extent needed, led by the Retailers' liaison counsel. We are of course willing to discuss any

material issues, but we also believe that these issues should have been raised many months ago, so

the back and forth should be as streamlined as possible at this point.

Thank you for your attention to this matter.

Very truly yours,

ADAM M. SLATER